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Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: EB Docket 06-36

Dear Ms. Dortch:

Pursuant to Commission rule 47 C.F.R Section 64.2009(e), CenturyLink hereby submits its annual CPNI Certification for 2011 for its affiliates listed in "Exhibit 4" of the attached document.

Please feel free to contact me if you need additional information.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Linda K. Gardner", with a long horizontal flourish extending to the right.

Linda K. Gardner

LKG:kmm
Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) Customer Proprietary Network Information (CPNI) Certification for 2012, covering the prior calendar year 2011.

Date filed: March 1, 2012

Name of companies covered by this certification:

Form 499 Filer ID: See Exhibit 4

Name of signatory: Shirish Lal

Title of signatory: Senior VP Marketing

I, Shirish Lal, am an officer of CenturyLink and acting as an agent of that company, and on behalf of the other companies identified in Exhibit 4 (collectively CenturyLink), I certify that I have personal knowledge that these companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission (FCC) CPNI rules. See 47 C.F.R. § 64.2001 *et seq.* My personal knowledge is based, in part, on the personal knowledge of those persons who represent to me that their organizations have procedures in place adequate to ensure compliance with the FCC's CPNI rules.

Attached to this certification are accompanying statements (Exhibit 1 & 2) describing how the various companies have established operating procedures that are adequate to ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the FCC's rules.

Actions Against Data Brokers. None of the CenturyLink companies took action in 2011 against data brokers either in courts or before regulatory bodies.

Customer Complaints. See Exhibit 3.

Signed /s/ 

[Electronic Signature]

Attachments: Accompanying Statement explaining CPNI procedures, Exhibit 1 & 2
Summary of Customer Complaints, Exhibit 3, CenturyLink Company Names/499
Filer IDs for CPNI Certification, Exhibit 4

EXHIBIT 1 TO COMPLIANCE CERTIFICATE

CenturyLink Statement of Operating Procedures

Below, CenturyLink¹ describes its operating procedures adequate to ensure compliance with the Federal Communications Commission (FCC) Customer Proprietary Network Information (CPNI) rules set forth in 47 C.F.R., Subpart U. The following processes and activities are utilized by CenturyLink prior to its submission of its certification.

1. Leaders of CenturyLink business units that may use CPNI or be involved with sales, marketing, customer care or repair certify to CenturyLink's CPNI Certifying Officer that, based on their personal knowledge, their business and market units have practices and procedures in place adequate to ensure compliance with the FCC's CPNI rules.
2. Apart from such certifications, as part of its standard operating procedures, CenturyLink takes advantage of the expertise and experience of various non-sales and marketing personnel in addressing privacy and CPNI issues. CenturyLink has a Chief Privacy Officer (CPO) within the Legal organization whose duties include advice and counsel on a variety of privacy and CPNI issues. The CPO's team includes experienced Compliance Managers, one of whom is primarily designated to address and counsel on the proper uses of CPNI. In addition, the Information Security group within Finance assists with many technical aspects of CPNI protection. Finally, CenturyLink employees interact with senior legal counsel experienced on CPNI matters when legal analysis or advice is required.
3. So that CPNI issues are timely and uniformly resolved across the business, the designated CPNI Compliance Manager hosts bi-weekly (and if necessary more frequently) CPNI conference calls which include the senior CPNI legal counsel. When appropriate, members of the business units, CenturyLink's CPO, or other CenturyLink attorneys will also attend these calls. During these calls, CPNI-related questions are discussed, issues are raised, solutions are reached and action plans established if necessary. In addition, the CPNI Certifying Officer is consulted or advised of issues as appropriate.
4. The CPO team assists CenturyLink business units as CPNI-related issues or questions arise, including those involved in product development, training, and supervision of marketing campaigns. This cooperative and collaborative cross-discipline approach to CPNI-issues management creates an atmosphere and structure that frames and supports operating procedures adequate to ensure compliance with the FCC's CPNI rules. This ongoing review will allow CenturyLink to identify gaps in legacy companies' practices, documentation, and methods and procedures and to reconcile those gaps to craft a single and uniform compliant model for the company.
5. CenturyLink's collaborative process has proven particularly useful in identifying potential differences or issues as CenturyLink reviews and integrates the various practices and capabilities across its legacy companies. For example, after the recent acquisition of Qwest, a cross-functional group began reviewing various customer care, e-commerce, and other processes and documented procedures of the merged companies to identify and resolve differences, such as differences in the area of authentication questions used and the language associated with billing address of record. This process served to

¹Exhibit 2 contains the statements applicable to Savvis, a CenturyLink Company. Because that company offers a very limited common carrier product line, i.e., interstate private line, its operations and processes are best addressed separately from the other CenturyLink companies that offer a broad suite of services (e.g., local and long distance voice services, business VoIP).

highlight a concern with respect to CenturyLink practices around the addresses used. Prior legacy CenturyLink certification filings specifically noted that certain notifications were sent to the "billing address on the account." While it is not necessarily the case that such an address would correlate to the "address of record," a review of legacy CenturyLink's operations proves that "billing address on the account" is the "billing address of record" the vast majority of the time. Nevertheless, to close the vulnerability for any customer where this may not be true, CenturyLink is working to ensure that policies and practices appropriately specify the use of "address of record."

6. CenturyLink employees receive CPNI training through a variety of mechanisms and programs. The CPNI training program explains CenturyLink's legal obligations regarding the use, storage, and disclosure of CPNI and discusses the application of the FCC's rules to the company's operations. New customer care employees receive CPNI training as part of their initial job training. Employees with direct sales, marketing and product responsibilities receive more-detailed training on the proper use of CPNI than other employees. Beyond its formal training, CenturyLink has created CPNI methods and procedures available for employees that are likely to access, use or disclose CPNI. The methods and procedures cover such steps as appropriately authenticating customers, obtaining one-time CPNI use permission, the use of passwords, and any required change notifications. CenturyLink publishes its procedures internally for easy access and consultation and uses those procedures in face-to-face training sessions, as well. Customer care employees have CPNI resources available in their online reference repository and supervisors periodically provide refresher training, particularly where a gap or potential area of concern has been identified.
7. CenturyLink takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. It performs routine security evaluations and assessments on its systems, including those containing CPNI. Additionally, CenturyLink's Information Security group performs external penetration tests on Internet-facing web portals to ensure proper security. In addition, only those persons with duties that require access to CPNI to perform their job functions are eligible for such access, and access is controlled through User IDs and passcodes.
8. CenturyLink has also adopted a Data Breach Incident Response Plan that identifies for employees how to report a suspected breach and the roles and responsibilities for investigating, mitigating, notifying and correcting any breach. Where the reporting of CPNI breaches is required under the FCC-mandated process (e.g., to the Department of Justice portal), CenturyLink's senior CPNI Compliance Manager reviews the facts of the matter; and if, after investigation, determines a breach has occurred, reports the breach. A log of such reports is maintained and CenturyLink will be maintaining these records for at least two years.
9. CenturyLink has adopted disciplinary processes, incorporated into the company's corporate compliance procedures and communicated to employees, to address employee mishandling or misuse of CPNI. Corporate Security, Legal or Human Resources personnel investigate instances of potential improper access to or disclosure of CPNI by employees. If the investigation indicated a violation has occurred, appropriate disciplinary action, ranging from coaching to termination, will follow.
10. CenturyLink's companies use both the opt-out and opt-in method to obtain customer approval to use CPNI for marketing purposes. For legacy CenturyLink companies, customers are first informed of the opt-out procedures through a CPNI notice sent to new

customers and are given a minimum of at least 30 days to opt-out prior to CenturyLink using their CPNI for marketing purposes. CenturyLink sends out biennial opt-out notices to its customer base, the last of which was sent in 2011. Customers are able to opt-out at no cost to them and to change their decision as they choose by contacting the company. There is a 1-800# designed to provide 24x7 access for customers to record their election. An opt-in mechanism is currently used for legacy Qwest customers.

11. The database marketing group generates customer lists for all marketing campaigns. Supervisory review occurs to identify those marketing campaigns that intend to use CPNI to market telecommunications services beyond those that customers currently subscribe to. Records are generated regarding the campaign, including such details as: a description of the campaign (including the proposed dates and campaign purpose), any CPNI that was used and the products or services intended to be offered. Documentation of campaigns is maintained for a year. Use of the CPNI by agents for marketing campaigns is also documented.
12. CenturyLink uses both employees and agents to market and sell its services. When it works through agents, the agents are required to abide by all CPNI regulations and have appropriate protections in place to ensure the ongoing confidentiality of the CPNI; limit access to persons who have a need to know such information in connection with the performance of the contract; and restrict the use of CPNI solely to the performance of the contract, in connection with the provisioning and marketing of communications related services and products. CenturyLink also makes CPNI available to vendors who market CenturyLink's and their own services when those vendors have proof of authorization from the customer. These vendors generally sell "packages" of products, including telecommunications and information services, and customer premises equipment (CPE).
13. CenturyLink's Privacy Policy and FAQs adopted in August 2011 also include a lengthy discussion of CPNI, with a link to the FCC's webpage that addresses CPNI and the Commission's rule.

EXHIBIT 2 TO COMPLIANCE CERTIFICATE
Savvis, a CenturyLink Company Statement of Operating Procedures

1. Savvis is a recently-acquired CenturyLink Company that provides IT infrastructure services for business applications globally, serving business and governmental customers. Savvis provides dedicated private line services to corporate and carrier customers and has no access to the information that its customers transmit over their private lines. Savvis does not provide voice services, consequently, does not have CPNI pertaining to telephone exchange or telephone toll services. Savvis has processes in place adequate to ensure compliance with the FCC's CPNI rules.
2. Savvis provides services pursuant to customer contracts. Contracts with Savvis' customers generally treat all customer information (some of which could be CPNI) as confidential pursuant to a mutual confidentiality provision. Prior written approval is required under these contracts for such information to be disclosed to third parties, except to the extent that disclosure is required for the purpose of the agreement or as required by law.
3. Savvis does not use CPNI for marketing or any other purpose other than to provide the service to the customer, including the billing and collection for any telecommunications services provided.
4. Savvis' customer information is maintained in a password protected database that can only be accessed by authorized employees for appropriate purposes such as responding to customer questions about their service or bill, or to address requests for troubleshooting or repair. Customers are able to access their own account information through a secure Internet website using an assigned user name and password.
5. When customers contact Savvis for information, the person calling is verified through a secure database as an authorized contact for the customer. If the individual is not listed as an authorized contact, Savvis requires the person seeking access to provide a written authorization from an authorized contact or a company executive on that company's letterhead to change the company's authorized contact list. In addition, larger business customers and carrier customers are assigned a dedicated client services partner.
6. All employees were required to sign and re-certify annually their understanding of and compliance with the Code of Conduct as a condition of employment. That Code of Conduct included a comprehensive section detailing how employees are expected to treat confidential information they are entrusted with in the course of their employment and beyond. "Confidential information" is broadly defined and includes any information that would be considered CPNI under 47 USC §222.

EXHIBIT 3 TO COMPLIANCE CERTIFICATE

Summary of CenturyLink Complaints or Incidences Concerning Unauthorized Release of CPNI

In 2011, CenturyLink investigated 10 substantiated complaints from its customers or incidences regarding unauthorized release of their CPNI. After an investigation, these complaints fell into the following categories

- ❖ Complaint based on an isolated incident allowing improper system access: 1
- ❖ Complaint or Incident based on improper disclosure or potential disclosure of CPNI to unauthorized third-party: 9

Exhibit 4 TO COMPLIANCE CERTIFICATE

CenturyLink Company Names/ 499 Filer IDs for CPNI Certification

CenturyLink Company Names/ 499 Filer IDs for CPNI Certification

<u>COMPANY NAME</u>	<u>499 Filer ID</u>
CenturyTel of Port Aransas, Inc.	804156
CenturyTel of Claiborne, Inc.	804159
CenturyTel of Central Louisiana, LLC	804162
CenturyTel of Mountain Home, Inc.	804165
CenturyTel of North Mississippi, Inc.	804168
CenturyTel of Arkansas, Inc.	804171
CenturyTel of North Louisiana, LLC	804174
CenturyTel of East Louisiana, LLC	804177
CenturyTel of South Arkansas, Inc.	804180
CenturyTel of Southeast Louisiana, LLC	804183
CenturyTel of Evangeline, LLC	804186
CenturyTel of Southwest Louisiana, LLC	804189
CenturyTel of Northwest Louisiana, Inc.	804198
CenturyTel of Odon, Inc.	804192
CenturyTel of Central Indiana, Inc.	804195
CenturyTel of Midwest - Michigan, Inc.	804201
CenturyTel of Wisconsin, LLC	804204
CenturyTel of Southern Wisconsin, LLC	805725
CenturyTel of Fairwater-Brandon-Alto, LLC	803583
CenturyTel of Chester, Inc.	804207
CenturyTel of Idaho, Inc.	804210
CenturyTel of Adamsville, Inc.	804213

CenturyTel of Redfield, Inc.	804216
CenturyTel of Central Arkansas, LLC	820918
CenturyTel of Northwest Arkansas, LLC	803998
Spectra Communications Group, LLC	820461
Telephone USA of Wisconsin, LLC	820906
CenturyTel of Central Wisconsin, LLC	820908
CenturyTel of Michigan, Inc.	804219
CenturyTel of Forestville, LLC	804222
CenturyTel of Larsen-Readfield, LLC	804225
CenturyTel of Monroe County, LLC	804228
CenturyTel of Northwest Wisconsin, LLC	804231
CenturyTel of Colorado, Inc.	804234
CenturyTel of Northern Wisconsin, LLC	804237
CenturyTel of the Southwest, Inc.	817886
CenturyTel of Ooltewah-Collegedale, Inc.	804246
CenturyTel of Ohio, Inc.	804249
CenturyTel of Chatham, LLC	804252
CenturyTel of San Marcos, Inc.	804255
CenturyTel of Northern Michigan, Inc.	804256
CenturyTel of Lake Dallas, Inc.	802890
CenturyTel of Ringgold, LLC	804759
CenturyTel of Washington, Inc.	806259
CenturyTel of Inter-Island, Inc.	806260
CenturyTel of Cowiche, Inc.	807099
CenturyTel of Eastern Oregon, Inc.	806263
CenturyTel of Oregon, Inc.	806262

CenturyTel of Montana, Inc.	806265
CenturyTel of the Gem State, Inc.	817854
CenturyTel of Eagle, Inc.	806277
CenturyTel of Wyoming, Inc.	806274
CenturyTel of the Midwest - Wisconsin, LLC	817862
CenturyTel of the Midwest - Kendall, LLC	801408
CenturyTel of Upper Michigan, Inc.	815632
CenturyTel of Minnesota, Inc.	805554
CenturyTel of Postville, Inc.	805557
CenturyTel of Alabama, LLC	822566
CenturyTel of Missouri, LLC	822568
Gallatin River Communications, L.L.C.	818006
Gulf Telephone Company	802182
Coastal Utilities, Inc.	808152
Mebtel, Inc.	802263
CenturyTel Acquisition LLC (formerly CenturyTel Solutions II, LLC)	825564
CenturyTel Fiber Company II, LLC (Lightcore)	823352
CenturyTel Long Distance, LLC	818150
Madison River Long Distance Solutions LLC	820060
Gulf Long Distance LLC	802281
Coastal Long Distance Services LLC	809134
Mebtel Long Distance Solutions LLC	822056
Madison River Communications, LLC	820646
CenturyTel Solutions, LLC	819995

Consolidated with 818150 as of 9/30/11

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Embarq Florida, Inc.	822076
Carolina Telephone and Telegraph Company LLC	822076
Central Telephone Company	822076
United Telephone Southeast LLC	822076
Central Telephone Company of Virginia	822076
United Telephone Company of the Carolinas LLC	822076
United Telephone Company of Ohio	822076
United Telephone Company of Indiana, Inc.	822076
United Telephone Company of New Jersey, Inc.	822076
United Telephone Company of Pennsylvania LLC	822076
United Telephone Company of Southcentral Kansas	822076
United Telephone Company of Eastern Kansas	822076
United Telephone Company of Kansas	822076
Embarq Minnesota, Inc.	822076
Embarq Missouri, Inc.	822076
United Telephone Company of the West	822076
United Telephone Company of Texas, Inc.	822076
Central Telephone Company of Texas	822076
United Telephone Company of the Northwest	822076
Embarq Communications, Inc.	825591
Embarq Payphone Services, Inc.	820698

Formerly Filer ID 803568

The El Paso County Telephone Company	807684
Qwest LD Corp	822734
Qwest Corporation	808440
Qwest Communications Company, LLC	808882
Savvis Communications Corporation	823962